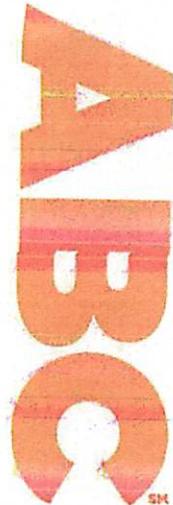


## **EXHIBIT B**



Kenya Key Rachal  
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC  
100 Vision Drive  
Suite 400  
Jackson, Mississippi 39211  
March 5, 2018

Re: Notice of Non-Compliance Re Paragraph 11.1 2<sup>nd</sup> Modified Mississippi Settlement Agreement and Reform Plan and Stipulated Third Remedial Order

Olivia Y v. et al. v. Phil Bryant as Governor Case No. 3:04CV251LNIU

SENT VIA E-MAIL

Dear Kenya:

Pursuant to Paragraph 11.1 of the 2<sup>nd</sup> Modified Mississippi Settlement Agreement and Reform Plan, and Paragraph 10 of the Stipulated Third Remedial Order ("STRO") Plaintiffs inform you of their intention to file a Motion with the Court to enforce their rights pursuant to Defendants' violation of paragraphs 5d and 10, of the STRO.

Specifically, Defendants are in violation of their agreement that by December 31, 2017, 90% of state workers will meet the caseload performance target of 90%. (STRO paragraph 5(d)). As verified by Public Catalyst, the underlying caseload data establishes that as of December 31, 2017, only 61% of workers met the required caseload standard.

Very truly yours,

/s/

Marcia Robinson Lowry  
Executive Director  
A Better Childhood, Inc.  
Counsel for Plaintiff Children

Attachment



March 4, 2018

Marcia Robinson Lowry  
A Better Childhood, Inc.  
1095 Hardscrabble Rd.  
Chappaqua, NY 10514

Dear Marcia:

MDCPS submitted caseload data on January 2, 2018. Public Catalyst validated that underlying data and prepared the attached report which indicates a statewide aggregate of 61% of workers met the caseload standard on December 31, 2017, below the performance target of 90%.

Sincerely,

A handwritten signature in black ink that reads "Lisa Alexander-Taylor".

Lisa Alexander-Taylor

Encl.

c: Eileen Crummy

Kevin Ryan